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February 26, 2024

BY HAND DELIVERY & CM/ECF

The Honorable Leonard P. Stark
United States District Court for the District of Delaware
J. Caleb Boggs Federal Building
844 North King Street
Wilmington, DE 19801-3570

Re: *Crystallex International Corp. v. Bolivarian Republic of Venezuela*,
D. Del. C.A. No. 1:17-mc-00151-LPS

Dear Judge Stark:

Pursuant to the Court's February 21, 2024 *Oral Order* [D.I. 970] rescheduling a Status Conference and directing the Special Master,¹ to confer with the Sale Process Parties and use reasonable efforts also to confer with other interested entities, I write to submit this proposed agenda (this "**Proposed Agenda**") on behalf of the Special Master. Consistent with the Court's instructions, the Special Master conferred with the Sale Process Parties, and solicited input from other interested entities, regarding the contents of the Proposed Agenda attached hereto in Exhibit A.

Respectfully,

/s/ Myron T. Steele

Myron T. Steele (#00002)

Counsel for Special Master
Robert B. Pincus

cc: All Counsel (via CM/ECF)

¹ All capitalized terms used but not otherwise defined herein, have the meanings ascribed to such terms in the *Sixth Revised Proposed Order (A) Establishing Sale and Bidding Procedures, (B) Approving Special Master's Report and Recommendation Regarding Proposed Sale Procedures Order, (C) Affirming Retention of Evercore as Investment Banker by Special Master and (D) Regarding Related Matters* [D.I. 481] (the "**Sale Procedures Order**").

Exhibit A

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL CORP.,)	
)	
Plaintiff,)	
)	
v.)	Misc. No. 17-151-LPS
)	
BOLIVARIAN REPUBLIC OF VENEZUELA,)	
)	
Defendant.)	

**NOTICE OF PROPOSED AGENDA FOR STATUS
CONFERENCE SCHEDULED ON FEBRUARY 27, 2024 AT 10:00 A.M.
(PREVAILING EASTERN TIME), BEFORE THE HONORABLE LEONARD P. STARK
AT THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE**

**PLEASE TAKE NOTICE, THE STATUS CONFERENCE SCHEDULED FOR
FEBRUARY 27, 2024, AT 10:00 A.M. (PREVAILING EASTERN TIME) IN THE
ABOVE-CAPTIONED CASE WILL BE CONDUCTED IN COURTROOM 2B OF THE
J. CALEB BOGGS FEDERAL BUILDING IN WILMINGTON, DELAWARE.**

I. STATUS CONFERENCE MATTERS:

1. Special Master's Marketing Process Update
2. Special Master's Update on Process for Final Determination of Attached Judgment Amounts
3. Special Master's Motion Requesting Amendment of Certain Priority Arrangement Procedures [Docket No. 928 – filed February 5, 2024]

Objection/Response Deadline: February 8, 2024 at 4:00 p.m. (ET)

Objections/Responses Received:

- A. Tidewater and Valores' Statement in Response to the Special Master's Motion [Docket No. 943 – filed February 8, 2024]
- B. Six Creditors' Response to the Special Master's Motion Requesting Amendment of Certain Priority Arrangement Procedures [Docket No. 945 – filed February 8, 2024]

Reply:

- A. Special Master's Reply in Support of His Motion Requesting Amendment of Certain Priority Arrangement Procedures [Docket No. 959 – filed February 12, 2024]

Court's Request for Views of the U.S. Marshals Service:

- A. Oral Order re: Views of the U.S. Marshals Service [Docket No. 965 – filed February 15, 2024]
- B. Special Master's Letter in Response to Court's Oral Order [Docket No. 978 – filed February 23, 2024]

Related Documents:

- i. Memorandum Order [Docket No. 646 – filed July 27, 2023]
- ii. Memorandum Order [Docket No. 738 – filed October 11, 2023]

Status: This motion is being heard on an uncontested basis.

POTTER ANDERSON & CORROON LLP

OF COUNSEL:

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Dated: February 26, 2024
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